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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ADAM PACHECO and HAROLYN
LANDAU,

Defendants.

2:19-cr-00248-KJD-DJA

**STIPULATION FOR A
PROTECTIVE ORDER**

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the public, or any third party not directly related to this case, any bank records, flight records, and/or other materials containing personally identifiable information of the defendants or other individuals provided by the Government during discovery in this case (the "Protected Material"). The parties state as follows:

1. The indictment in this case issued on October 1, 2019.
2. Trial is currently set for February 10, 2020.
3. The Government has already produced substantial discovery, and desires and intends to produce additional discovery as soon as possible.
4. The indictment in this case arises out of an alleged multi-year wire fraud scheme

1 carried out by the defendants that involved numerous alleged victims and witnesses.

2 5. The Government believes that dissemination of the Protected Material would
3 reveal personal identifying information of the defendants and potential witnesses. The
4 Protected Material consists of voluminous flight records, which contain the personal identifying
5 information of persons who purchased flights. It also consists of voluminous records from
6 financial institutions, which contain the personally identifiable information of the account
7 holders. The voluminous nature of these records makes it impractical to redact manually each
8 item of personally identifiable information.

9 6. In order to protect the personal identifying information of the defendants and
10 potential witnesses involved in and revealed by the Protected Material, the parties intend to
11 restrict access to the Protected Material in this case to the following individuals: the defendants,
12 attorneys for all parties, and any personnel that the attorneys for all parties consider necessary
13 to assist in performing that attorneys' duties in the prosecution or defense of this case, including
14 investigators, paralegals, experts, support staff, interpreters, and any other individuals
15 specifically authorized by the Court (collectively, the "Covered Individuals").

16 7. Without leave of Court, the Covered Individuals shall not:

- 17 a. make copies for, or allow copies of any kind to be made by any other
18 person of the Protected Material in this case;
- 19 b. allow any other person to read, listen, or otherwise review the Protected
20 Material;
- 21 c. use the Protected Material for any other purpose other than preparing to
22 defend against or prosecute the charges in the indictment or any further
23 superseding indictment arising out of this case; or
- 24 d. attach the Protected Material to any of the pleadings, briefs, or other court

1 filings except to the extent those pleadings, briefs, or filings are filed under
2 seal.

3 8. Nothing in this stipulation is intended to restrict the parties' use or introduction
4 of the Protected Material as evidence at trial or support in motion practice.

5 9. The parties shall inform any person to whom disclosure may be made pursuant
6 to this order of the existence and terms of this Court's order.

7 10. Should a reasonable need for this protective order cease to exist, on grounds
8 other than a Covered Individual or some other person violating or circumventing its terms, the
9 Government will move expeditiously for its dissolution.

10 11. The defense hereby stipulates to this protective order.

11 Respectfully submitted,
12 For the United States:

13 NICHOLAS A. TRUTANICH
14 United States Attorney
Nevada Bar Number 13644

15 /s/
16 DANIEL E. CLARKSON
Assistant United States Attorney

17 For the defense:

18 /s/
19 RICHARD G. STACK
Attorney for ADAM PACHECO

20 /s/
21 ERIN M. GETTEL
Assistant Federal Public Defender
Attorney for HAROLYN LANDAU

22
23 **IT IS SO ORDERED:**

24 
DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

December 10, 2019
Date